

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Implementation of Section 17 of the)
Cable Television Consumer Protection)
and Competition Act of 1992)
)
Compatibility Between Cable Systems)
and Consumer Electronics Equipment)

ET Docket No. 93-7

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF THE AMERITECH OPERATING COMPANIES

The Ameritech Operating Companies¹ hereby submit these comments in response to the Supplemental Comments of the Cable-Consumer Electronics Compatibility Advisory Group.² On January 29, 1993, the Commission released a Notice of Inquiry ("NOI") seeking information on how to best implement Section 17 of the Cable Television Consumer Protection and Competition Act of 1992.³ Section 17 of the Cable Act requires that the Commission issue a report to Congress specifying the means by which it intends to ensure compatibility of consumer electronics equipment with cable systems, and to thereafter promulgate the appropriate rules.⁴ The Advisory Group was convened in response to this Congressional directive. After considering this issue for several months, the Advisory Group has developed a set of short-term and long-term recommendations.

The Companies would like to take this opportunity to restate their concern that the issue of consumer electronics compatibility must not proceed without fully considering

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc., collectively referred to herein as the "Companies."

² Supplemental Comments of the Cable-Consumer Electronics Compatibility Advisory Group ("Advisory Group"), dated July 21, 1993.

³ Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-358 ("1992 Cable Act").

⁴ NOI at ¶ 3.

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the impact any rules or standards may have on the future development of video dialtone services. This is particularly important with respect to the "long-term" recommendations of the Advisory Group. Because resolution of the fundamental problems will take some time, the decision-making process should not ignore developing technologies that will be affected by the outcome of this issue.

Clearly, video dialtone systems are being developed today for implementation in what appears to be the time frame of implementation of the proposed long-term recommendations.⁵ It is critically important for the viability of video dialtone that the standards for compatibility not foreclose the development and growth of video dialtone. One of the key objectives of Congress in passing the 1992 Cable Act was to increase competition in the cable industry.⁶ The issue of "standards" should not frustrate the accomplishment of this goal.

The Companies urge the FCC to seek input from as many sources as possible, including local exchange companies, interactive video programming producers, and the other non-traditional video programmers, as work on this issue continues. Only in this manner can the American public be assured that the compatibility standards will not be biased toward any particular segment of the video services industry.

Respectfully submitted,



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⁵ Supplemental Comments at p. 11.

⁶ 1992 Cable Act, Findings 2, 4 and 5.

CERTIFICATE OF SERVICE

I, Jenell Thompson, do hereby certify that copies of the foregoing letter has been served to all parties on the attached service list by first class mail, postage prepaid, on this 10th day of August, 1993.

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